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Public Comments on Developing an Unified Intercarrier Compensation:=====

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The FCC should abandon latest proposal which encompasses promoting wireless last-mile coverage of broadband infrastructure: FCC 11-13. I have appended notes from the 289 page report http://www.fcc.gov/Daily_Releases/Daily_Business/2011/db0209/FCC-11-13A1.pdf at the end of this note that explain how the FCC plan amounts to the first steps in the abolition of land-line service.

Meanwhile, the science on cell phones is clear that there is a problem. Here are the cliffnotes:

- * Congressional hearings held in '08+'09 enumerated dangers of using a cell phone
- * last month's NIH report explained that brain scans showed that 50 minutes on a cell phone drastically changed brain metabolism in the area of the brain linked with judgment and repression of rage
- * the \$25 million CTIA study in the mid-nineties found double strand DNA breaks, acoustic neuroma increases and cell micronucleation
- * the European REFLEX studies in 2000 found deleterious biological effects from cell phone radiation
- * the German company T-Mobil did a survey of existing literature finding negative consequences to cell phone use
- * the Austrian reinsurance industry refused to reinsure wireless companies after finding decreased test performance by adults who used a cell phone for a couple of hours and irregularities in test tube samples of blood exposed to cell phone radiation
- * Appendix 2 of the WHO INTERPHONE Report released in April, 2010 links 10 years of cell phone to a doubling of gliomas
- * The U.S. Presidential Cancer Panel Report called wireless technologies likely carcinogens
- * the UK and Israeli governments have informed the public **not** to abandon their landlines; Israel recommends corded landlines and not portable phones (which emit microwave radiation).
- * major scientists including David Carpenter of the Presidential Cancer Panel, Devra Davis, founder for the Center for Environmental Oncology, Lloyd Morgan of the Central Brain Tumor Registry say that we are at the beginnings of a major brain tumor and cancer epidemic from cell phones
- * studies link cell phone use to gliomas, meningiomas, acoustic neuromas, parotid gland tumors, tinnitus, sperm count drops, testicular cancer, decreased performance on tests, cognitive processing problems including but not limited to ADHD.
- * the WHO acknowledges that 3% of the world population suffers from electrosensitivity and cannot tolerate proximity to cell phones, cell towers, wi-fi and other forms of electromagnetic pollution

The FCC needs to preserve wired last mile service. The big picture here is that utilities are trying to force consumers to go wireless; have phone service and internet delivered wirelessly exclusively, and have wireless smart meters put on to meter electricity usage. Smart meters, which have been rolled in by some utilities in New York State are projected to exceed the paltry FCC violations which even the federal Interagency Working Group on Radiofrequency Radiation deems to be non-protective of human health (see: Assessment of Radiofrequency Microwave Radiation Emissions from Smart Meters) <http://sagereports.com/smart-meter-rf/>

All of this wireless radiation is a known mutagenic carcinogen (per Dr. David O. Carpenter of the U.S. Presidential Cancer Panel) and levels of it should not be increased in public places. Long term public infrastructure investments in this country should use wired technology, not wireless. In light of problems with cell phones, cell towers and similar sources of continuous exposure to microwave radiation, it does not make sense to increase levels of RFR in public places and certainly not in peoples' homes.

NOTES on FCC PROPOSAL document:

FCC NOTICE OF PROPOSED RULEMAKING ON "CONNECT AMERICA FUND"
FCC 11-13

http://www.fcc.gov/Daily_Releases/Daily_Business/2011/db0209/FCC-11-13A1.pdf

Comments due April 18, 2011

Reply comments due May 23, 2011

Overview: Broadband delivered via wire, fiberoptic, cable or even satellite does not pose a health hazard from radiation. Wireless broadband that powers cell phone, video conferencing, wireless computer connections, etc emits increasing amounts of EMR 24/7. This proposal is for all technologies that deliver broadband to compete to deliver broadband 24/7 for the least cost.

Existing Universal Service Fund for Phone Service to be converted to funding broadband for the 24 million Americans with no access. In order to let most people in the US have phone service, the "Universal Service Fund" was created. It subsidizes phone service in areas that would otherwise not have phone service because of the high cost. From 1998 to today, the Universal Service Fund has grown from \$2.3 billion to almost \$9 billion. At first, consumers were "taxed" 5.53 % of interstate revenues to support this fund. This "tax" has now shot up to 15.5 %. The FCC is proposing phasing out all this funding for just telephone service and paying the \$9 billion fund to those companies that can provide broadband to everyone within various census blocks at the lowest cost through reverse auctions.

The FCC promises to provide a "National Broadband Map" to show where the funds to promote broadband would be targeted in the First Phase of the Connect America Fund. Para 261 p.91

The FCC seems to envision using "wired" or "fixed" networks to get the signal to cell towers and then using cell towers to get most of the signal elsewhere combined with Wi Fi in every home to promote "mobile broadband connectivity." #4 See diagrams at Para 117 pg 43-44

There are no references to considering the impact of the wireless method for "the last Mile" of connection to homes to the health of people with electrosensitivity and implants we documented in our previous filing on broadband that is part of this docket.

"Technology Neutral" bidding. The FCC plan is for competitive bidding by all wired and wireless or combination of broadband technologies for providing broadband to all the different census blocks of population that do not have access in the country. The FCC may reserve satellite (which gives off very little EMR) for the most difficult to reach places. Para #104 pg 39. The FCC plans to authorize and fund the provider of whichever technology comes up with the least expensive plan for each census block. We are not able to tell which census blocks are targeted with this funding but it appears that the FCC is moving toward requiring that all providers give broadband rather than just phone service. ie-wired will be competing with wireless and the consumer gets no say in which technology is delivered to their home.

The FCC notes that 27 % of adults live in households with only wireless phones. Para # 8

Health: There is no discussion or consideration of the adverse effects of wireless broadband radiation to health or those with medical implants that may malfunction from this radiation.

The FCC seeks to "limit the contribution burden on households" Para 80 pg 31

This is an opportunity to talk about the burden on households of being subjected to unwanted EM radiation, the costs of shielding, finding other places to live, being unable to work, etc.

The FCC asks "Are there other metrics we should consider that are unrelated to speed or service quality such as mobility?" Para 114 p 41

NEPA. "We note that recipients deploying new infrastructure also would have to comply with the National Environmental Policy Act and other relevant federal environmental statutes, as well as all local requirements for construction. Para 136 pg 49

Equipment, knowledge and experience needed by Consumer. The FCC admits that if people don't have a computer or digital literacy, broadband won't be for everyone. Para 141 p 51 (Imagine people with Alzheimers trying to learn how to do computer calls)

The FCC wants to know how to best "achieve synergies with the connectivity objectives articulated for schools, libraries, and rural health care facilities. Para 149 p 53

"We seek comment on whether any additional public interest obligations should apply to Universal Service Fund recipients." Even if they aren't given funds, should the company be required to meet minimum requirements. Para 150 p 54

The FCC does not believe that transitioning these forms of support would violate the 5th Amendment Takings Clause and notes that "The purpose of universal service is to benefit the consumer, not the carrier." Para 240 pg 84-5

One CAF Provider Per Unserved Area. The FCC wants to know what risks there are of such arrangements. Para 282 p 95. For those who are electrosensitive, think of the risk they face if the FCC awards to funds to a wireless provider.

Prospect of mobile wireless broadband everywhere!. AT&T has proposed that the FCC support an Advanced Mobility Fund until there "were no more areas unserved by mobile wireless broadband and voice service." Para 403 p 125.

Monitoring. The FCC asks what kinds of field inspections and tests are appropriate? Para 477 p144 (EMR Policy believes a huge number of cell antennas are already in violation and the FCC does nothing)

Limit Universal Service Contribution Burden on Households. The FCC seeks to not impose an excessive burden on American consumers who are ultimately the payers for the Fund. Para 487 p 147

Data. The FCC intends to use a "data-driven process to analyze the proposed reforms. Commenters should submit data to explain and substantiate their position or concerns. " para 536 p 168 "We note that there appear to be significant complexities associated with determining the magnitude of cost savings passed on to consumers. "Para 571 p 180